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**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK**

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Chapter 11

Case No. 20-20230 (PRW)

Advisory Trust Group, LLC, as trustee of the RDC  
LIQUIDATING TRUST,

Plaintiff,

v.

JOM PHARMACEUTICAL SERVICES INC., a/k/a/  
JANSSEN PHARMACEUTICALS; JOM  
PHARMACEUTICAL SERVICES INC. d/b/a/  
JANSSEN PHARMACEUTICA, L.P.,

Defendants.

Adv. Proc. No. 22-02020-PRW

**FOURTH STIPULATION EXTENDING TIME TO ANSWER COMPLAINT**

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC (“Plaintiff” or the “RDC Liquidating Trust”), successor in interest to Rochester Drug Co-Operative, Inc. (“Debtor”), and defendant, JOM Pharmaceutical Services, Inc., erroneously sued herein as a/k/a or d/b/a Janssen Pharmaceuticals and Janssen Pharmaceutical, L.P. (“Defendant” and, together with Plaintiff, the “Parties”), by and through their undersigned attorneys, hereby stipulate and agree:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the “Complaint”) against Defendant;

WHEREAS, the summons (the “Summons”) was issued on February 4, 2022;

WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint; and

WHEREAS, on February 28, 2022, the Parties entered into a stipulation (the “First Stipulation”) by which the time required for Defendant to answer the Complaint was extended through and including April 15, 2022. The First Stipulation was approved by order entered March 1, 2022.

WHEREAS, on March 23, 2022, the Parties entered into a stipulation (the “Second Stipulation”) by which the time required for Defendant to answer the Complaint was further extended through and including June 15, 2022. The Second Stipulation was approved by order entered March 24, 2022.

WHEREAS, on May 10, 2022, the Parties entered into a stipulation (the “Third Stipulation”) by which the time required for Defendant to answer the Complaint was further extended through and including October 14, 2022. The Third Stipulation was approved by order entered May 11, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject to Court approval, to further extend the time for the Defendant to answer the Complaint to and including December 16, 2022.

*[Remainder of Page Intentionally Left Blank]*

2. All other terms set forth in the First Stipulation, Second Stipulation, and Third Stipulation remain in full force and effect.

Dated: August 19, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf

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*Counsel to Plaintiff RDC Liquidating Trust*

Dated: August 19, 2022

PATTERSON BELKNAP WEBB & TYLER LLP

/s/ David W. Dykhous

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*Counsel to Defendant JOM Pharmaceutical Services, Inc.*

SO ORDERED:

DATED: \_\_\_\_\_, 2022  
Rochester, New York

\_\_\_\_\_  
HON. PAUL R. WARREN  
United States Bankruptcy Judge